

REMARKS

Claims 1-20 were originally filed in the present application.

Claims 1-20 are pending in the present application.

Claims 1-20 were rejected in the December 15, 2005 Office Action.

No claims have been allowed.

Reconsideration of Claims 1-20 is respectfully requested in light of the following arguments.

In Sections 4-12 of the December 15, 2005 Office Action, the Examiner rejected Claims 1-5, 7-13, 15-18 and 20 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,608,832 B2 to Forslow (hereinafter, simply "*Forslow*"). In Section 13-15 of the Office Action, the Examiner rejected Claims 6, 14 and 19 under 35 U.S.C. 103(a) as being unpatentable over *Forslow* in view of U.S. Patent No. 5,603,084 to Henry, et al. (hereinafter, simply "*Henry*"). The Applicants respectfully traverse these rejections.

The Applicants direct the Examiner's attention to independent Claim 1, which contains the unique and non-obvious limitations emphasized below:

1. For use in a wireless network comprising a plurality of base stations, each of said base stations capable of communicating with a plurality of mobile stations, a security device capable of preventing an unprovisioned one of said plurality of mobile stations from accessing an Internet protocol (IP) data network through said wireless network, said security device comprising:

a first controller capable of receiving from said unprovisioned mobile station an IP data packet comprising an IP packet header and an IP packet payload and replacing said IP packet header with a replacement IP packet header comprising an IP address of a selected one of at least one provisioning server of said wireless network.
(emphasis added)

The Applicants respectfully assert that the above-emphasized limitations are not disclosed, suggested, or even hinted at in the *Forslow* reference. In rejecting Claim 1, the Examiner asserts that the *Forslow* reference discloses the above-emphasized limitations in the DHCP relay agent 120 of Fig. 9 and at column 19, line 55, through column 20, line 20, describing Fig. 13. The Applicants respectfully submit that the Examiner has mischaracterized the teaching of the *Forslow* reference.

As described in the Abstract, the *Forslow* reference discloses a mobile communications network in which a mobile station may specify a requested quality of service for each application it runs. Once the mobile station has established an initial communication session with a server external to the network, a common access procedure permits the mobile station to establish subsequent application flows using an abbreviated procedure, without having to access the external server again. The passage relied upon by the Examiner describes this common access procedure.

The cited passage of the *Forslow* reference (column 19, line 55, through column 20, line 20) states:

The relay agent 120 secures message transfer between the DHCP client 104 and server 134 by **adding** an agent identifier (corresponding to the MSid) to each DHCP message sent to the DHCP configuration server 134 in the ISP. The configuration relay agent 120 later uses the agent identifier to filter out and stop packets to/from the mobile station that did not have the correct IP address in the header. The agent remote identifier (remote ID) and a subnet mask, and a gateway IP address (giaddr) which is an address that identifies the GGSN, are sent to the ISP 130 where they are checked and stored.

The ISP 130 uses the subnet mask and giaddr to route a response back to the GGSN, which in turn, forwards the response to the mobile station based on the agent remote ID. The agent remote ID also gives the ISP additional assurance that the mobile station is not "faking" its identity during the dynamic host configuration procedures. Accordingly, following the above-described common authentication

procedure, the configuration relay agent 120 **adds** the GGSN's IP address to the giaddr field and relays the DHCP Discover message to the DHCP server.

The DHCP server 134 in the ISP replies to the Discover message with an Offer message passed on by the GGSN relay agent 120 towards the mobile station including the "offered" configurations that the DHCP server 134 can provide (after checking the incoming and outgoing tunnel identifiers). Multiple offers can be received from various DHCP servers. The mobile station selects the DHCP offer that best satisfies its requirements and sends a DHCP request message to the DHCP server which provided the selected offer. The DCHP server then provides an IP address to the GGSN in a DHCP Acknowledgment message. The IP address is placed in a table along with the mobile's agent remote ID and agent circuit ID/tunnel identifier. (*emphasis added*)

Thus, the cited passage describes a relay agent that adds information to messages exchanged between a mobile station and a server. Furthermore, Fig. 13 makes clear that communication between a mobile station and a Gateway GPRS* Support Node uses GPRS Tunneling Protocol (GTP). In GTP, packets are encapsulated at an originating node and 'decapsulated' at a destination node at the IP level. *See Forslow, Col. 3, lines 35-40.*

As such, the clear teaching of the *Forslow* reference is a system that provides security in communications between a mobile station and a server by adding information to packets, either by adding further identification information to the packet payload or by encapsulating the packets (header and payload) within tunneling packets. Nowhere does the *Forslow* reference describe replacing header information in a received packet. Thus, the *Forslow* reference does not teach a first controller capable of replacing an IP packet header with a replacement IP packet header comprising an IP address of a provisioning server, as recited in Claims 1.

* GPRS: General Packet Radio Service.

In sum, independent Claim 1 contains unique and non-obvious limitations that are not disclosed, suggested, or even hinted at in the *Forslow* reference. The Applicants respectfully assert that the *Henry* reference does nothing to overcome the shortcomings of the *Forslow* reference. Thus, Claim 1 is patentable over the *Forslow* reference and the *Henry* reference, either separately or in combination. Additionally, Claims 2-8 depend from Claim 1 and contain all of the unique and non-obvious limitations recited in Claim 1. This being the case, Claims 2-8 are also patentable over the *Forslow* and *Henry* references.

The Applicants respectfully assert that independent Claims 9 and 17 recite limitations that are analogous to the unique and non-obvious limitations recited in Claim 1. Thus, Claims 9 and 17 are patentable over the cited prior art. Additionally, dependent Claims 10-16 and 18-20 depend from independent Claims 9 and 17, directly or indirectly, and contain all of the unique and non-obvious limitations recited in independent Claims 9 and 17. As such, Claims 10-16 and 18-20 also are patentable over the *Forslow* and *Henry* references. The Applicants request the withdrawal of the §102 rejection of Claims 1-5, 7-13, 15-18 and 20 and the §103 rejection of Claims 6, 14 and 19.

The Applicants also disagree with the Examiner's rejections of Claims 2-20 based on additional misdescriptions and/or misapplications of the *Forslow* and *Henry* references to at least some of Claims 2-20. However, the Applicants' arguments regarding those other shortcomings of the *Forslow* and *Henry* references are moot in view of the Claim 1 arguments above. However, the Applicants reserve the right to dispute in future Office Action responses the appropriateness and the

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applications of the *Forslow* and *Henry* references to the claims of the present application, including the right to dispute assertions made by the Examiner in the May 31, 2005 Office Action.

SUMMARY

For the reasons given above, the Applicants respectfully request reconsideration and allowance of pending claims and that this Application be passed to issue. If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this Application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@davismunck.com*.

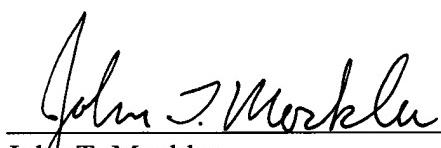
The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

DAVIS MUNCK, P.C.

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P.O. Drawer 800889
Dallas, Texas 75380
Phone: (972) 628-3600
Fax: (972) 628-3616
E-mail: *jmockler@davismunck.com*


John T. Mockler
Registration No. 39,775